

**Japanese Government's comments on the program of amendment of the rule of  
the Social Security Number by the Social Security Administration**

**May 13, 2003**

The Government of Japan hereby submits the comments on the program of amendment of the rule of the Social Security Number (SSN) announced by Social Security Administration (SSA) on March 26, 2003.

1. In the United States, presentation of SSN is required in principle on various occasions in daily life such as application for a driver's license or a credit card, opening a bank account, and signing a lease contract for housing. As a result, there are many cases where dependents of Japanese staff working at Japanese firms in the United States, who are legal foreign residents with nonemployment-based visas and cannot obtain SSN, are faced to inconvenience in the daily life. The Government of Japan recognizes that such problems result from SSN virtually being the sole measure for identification in the United States. Consequently, The Government of Japan above all requests SSA to amend the rule so that legal foreign residents with nonemployment-based visas can obtain SSN.

2. One of the most serious obstacles they face caused by the lack of their entitlement to obtain SSN is the difficulty to acquire a driver's license, for which some states still admit only SSN as the measures of identification. Since it causes critical inconvenience to live without automobile in the United States, the absence of SSN for the dependents of Japanese staff workers eventually hampers their daily life to a significant extent.

The Government of Japan appreciates that most states have introduced alternative measures of identification on issuing driver's license as a result of the recommendation by SSA to do so. Some state governments, however, still require the applicants of driver's license to present SSN.

If SSA enforces the proposed amendment of the rule and the issuance of SSN ceases due to an explicit regulatory demand, legal foreign residents with nonemployment-based visas will be completely unable to obtain a driver's license in these states.

Therefore, while it may be even if it is difficult to realize the proposal mentioned in the paragraph 1 above promptly, the Government of Japan strongly requests that the Government of the United States consider the following steps, as tentative measures.

(1) The Government of the United States should strongly request all the state governments which require the presentation of SSN in applying for a driver's license to introduce specific alternative identification measures available to legal foreign residents who cannot obtain SSN. The Government of the United States, above all, should strongly request the state of Illinois where they still face the most serious obstacles to reform its system as quickly as possible. In addition, the Government of the United States should petition that the state governments strive to innovate the measures which are available practically and lightly to all legal foreign residents, in case of introduction of alternative measures for identification.

(2) The Government of the United States should suspend the enforcement of the proposed rule, until all state governments introduce alternative measures for identification.

3. The Government of Japan would like to urge the Government of the United States to recall the fact that the Government of Japan has repeatedly articulated these requests in course of bilateral dialogues such as the Japan-U.S. Enhanced Initiative on Deregulation, the Japan-U.S. Regulatory Reform and Competition Policy Initiative and the Investment Initiative, and anticipates that the Government of the United States will earnestly consider the above-mentioned recommendations.